

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

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UNITED STATES OF AMERICA

Plaintiff,

VS.

BERNETTA WILLIS

Defendant.

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DEBRA P. HACKETT, CLK
DOCKET NO. 2006-071
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA


MOTION FOR DETENTION HEARING

COMES NOW the defendant, by and through her attorney, Valerie Murry Smedley, and moves this Honorable Court for a detention hearing in the above-styled cause. As grounds counsel would show unto the Court the following:

1. That the defendant is presently detained in the Autauga County Detention Facility.
2. That the defendant has stated she has five (5) minor children who have serious medical needs.
3. That the defendant does not have sufficient family support to care for the minor children.
4. That if the defendant is allowed to be released, electronic monitoring, along with a reasonable curfew, would allow her to be home with the children and allow close supervision under the Pretrial Release Program.
5. That if released, the defendant will follow all conditions as set out by this Honorable Court and Pretrial Release.

WHEREFORE, the premises considered, the defendant prays that this Honorable Court will schedule a detention hearing at the Court's earliest to determine the defendant's release pending the trial of this matter.

Respectfully submitted this 18th day of January, 2007.



VALERIE MURRY SMEDLEY **SME003**
Attorney for the Defendant

ADDRESS OF COUNSEL:

459 South McDonough Street
Montgomery, AL 36104
(334) 230-9596

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing motion upon the Honorable Christopher A. Snyder, Assistant U.S. Attorney, Middle District of Alabama, One Court Square, Suite 201, Montgomery, AL 36104, by placing a copy of same in the U.S. Mail, postage prepaid and properly addressed, on this the 18th day of January, 2007.


VALERIE MURRY SMEDLEY
Attorney for Defendant